

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,

Plaintiff,

V.

Universal Protection Service, LP,
d/b/a Allied Universal

Defendant.

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CIVIL ACTION NO. 4:23-cv-02823

## Jury Trial Demanded

**PLAINTIFF TWANA AHMED'S MOTION TO SEAL CERTAIN TRIAL  
EXHIBITS AND RELATED TRIAL TESTIMONY**

## I. NATURE AND STAGE OF PROCEEDING

This case concerns the civil rights of workers. It involves allegations that Allied fails to protect its workers from retaliation when they report discrimination, Allied's manager threatened to physically harm a worker, and Allied's manager called the worker a sand-nigg\*r while suspending him for refusing to sign a false incident report. Allied disputes the allegations. The final pretrial conference is set for August 13, 2025, and jury trial is set for August 18, 2025.

## II. ISSUE & STANDARD OF REVIEW

The issue is whether to grant Mr. Ahmed’s motion to seal certain trial exhibits and related trial testimony. Courts have discretion to seal judicial records, which is reviewed for an abuse of discretion. *SEC v. Van Waeyenberghe*, 990 F.2d 845, 848 (5th Cir. 1993).

## III. ARGUMENT & AUTHORITY

Though the public has a general right to access court records, that right is “not absolute.” *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 597 (1978). “Every court has supervisory power over its own records and files, and access has been denied where court files might have become a vehicle for improper purposes.” *Id.* at 598. Courts have sealed judicial records to preserve confidentiality of nonpublic information when disclosure would harm a party. *See, e.g., id.* (providing examples, such as preventing use of court records to gratify private spite); *DISH Network, LLC v. WLAJ- TV, LLC*, CV 16-0869, 2017 WL 1333057, at \*2 (W.D. La. Apr. 3, 2017) (business information and competitive standing).

Plaintiff Twana Ahmed moves to seal confidential trial exhibits and certain related trial testimony. The trial exhibits in question were marked “CONFIDENTAL” and provided to Defendant Allied Universal pursuant to agreement that the information would remain confidential, be used solely for this case, and not publicly filed. Even public disclosure of the *basis* for sealing could cause serious physical injury or death. So, Mr. Ahmed’s attorneys request *in camera* presentation of the factual basis for sealing and this motion. They request

the opportunity to do so at the final pretrial hearing or such other time as the Court may direct before the evidentiary portion of trial starts.

#### **IV. CONCLUSION**

To prevent serious physical injury or death, Plaintiff Twana Ahmed respectfully requests that the Court order Mr. Ahmed's trial exhibits 81 and 98, and certain related trial testimony, sealed.

Date: August 12, 2025

Respectfully submitted,

*/s/ Amanda Hernandez*

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*Attorneys for Twana Ahmed*

**CERTIFICATE OF CONFERENCE**

I certify that plaintiff's counsel attempted to conference with defense counsel regarding this motion. Defense counsel previously agreed to keep the exhibits in question confidential but have not responded regarding their agreement or opposition to this motion. The parties were scheduled to confer on various pre-trial matters today at 5:00pm, but defense counsel cancelled that meeting, so we do not anticipate them responding with their position on this motion before tomorrow.

/s/Amanda C. Hernandez  
Amanda C. Hernandez

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 12, 2025, *Plaintiff Twana Ahmed's Motion to Seal Certain Trial Exhibits and Related Trial Testimony* was filed via the Court's CM/ECF system, thereby serving Defendant's attorneys of record.

/s/Amanda C. Hernandez  
Amanda C. Hernandez